

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

NATIONAL GRANGE MUTUAL	)	
INSURANCE COMPANY	)	
As Subrogee of Gary and Amanda	)	Civil Action No. 04-40227
Kazowski	)	
55 West Street	)	
Keene, New Hampshire 03431,	)	
Plaintiff(s),	)	
	)	
v.	)	
	)	
AMERICAN STANDARD, INC.	)	
One Centennial Avenue	)	
P.O. Box 6820	)	
Piscataway, NJ 08855	)	

**JOINT STATEMENT OF THE PARTIES**

1. Rule 26(a)(1) Initial Disclosures

The parties propose that initial disclosures be exchanged on or before April 15, 2005.

2. Amendments to Complaint and Answer

The parties propose that amendments to the Complaint and Answer, if any, be made on or before June 1, 2005.

3. Written Discovery

The parties propose that Requests for Production of Documents and Interrogatories shall be served on or before June 1, 2005. Requests for Admissions, if any, shall be served on or before August 1, 2005.

4. Depositions

The parties propose that all depositions other than expert depositions shall be completed on or before November 1, 2005.

5. Deadline, Fact Discovery

The parties propose that fact discovery shall close on November 1, 2005.

6. Identification of Experts

The parties agree that the plaintiff shall serve expert disclosures on or before December 15, 2005. The parties further agree that the defendant shall designate its experts on or before January 15, 2006.

7. Expert Depositions

The parties agree that the depositions of the plaintiff's experts shall be completed on or before January 15, 2006. The parties further agree that the deposition of the defendant's experts shall be completed on or before February 15, 2006.

8. Filing of Dispositive Motions

Summary judgment and other dispositive motions shall be filed no later than April 1, 2006. Oppositions to summary judgment and other dispositive motions shall be filed no later than twenty-one (21) days after service and filing of the Motion opposed.

9. Trial by Magistrate

The parties do not consent to trial by magistrate.

10. Continued Supervision/Discovery Master

The parties do not believe that a discovery master will be required.

The Plaintiff,  
NATIONAL GRANGE  
MUTUAL INSURANCE CO.  
Subrogee,  
By its Attorneys,

The Defendants,  
AMERICAN STANDARD INC.  
By its Attorneys,

s/ Erick J. Kirker  
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AND

s/ Judith Feinberg  
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Attorney for Plaintiff

Dated: March 18, 2005